

Appendix C  
BEST Audit Report  
(Draft)

## APPENDIX C BEST AUDIT REPORT

An environmental audit conducted at BEST led to the following audit report. Audit findings #023 and #040 were chosen by the Park to be addressed in their current-year EMS. How BEST integrated the requirements associated with these two findings (one regulatory and one non-regulatory) can be seen by reviewing the BEST EMS Manual.

Park	Finding No	Priority	Citation	ENV. CHECK SHEET	FINDING DESCRIPTION	RECOMMENDED CORRECTIVE ACTION	LOCATION	CORRECTIVE ACTION
BEST	001	1	29 CFR 1910.1200 (e)(1)	Hazard Communication	A written Hazard Communication (HAZCOM) program was not developed or implemented.	Develop and implement a written HAZCOM program.	Park-wide	
BEST	002	1	29 CFR 1910.1200 (h)	Hazard Communication	Hazard Communication (HAZCOM) training and information was not effectively provided to all employees that encounter hazardous chemicals in their work area at the time of their initial assignment or whenever a new physical or health hazard was introduced into their work area.	Provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new physical or health hazard is introduced into their work area.	Park-wide	
BEST	003	2	29 CFR 1910.120 (q)(6)(ii)	Emergency Response Planning and Reporting	Staff was not trained at the “first responder operation level” for hazardous substances spills. Staff was expected to defensively respond to fuel spills.	Provide eight hour first responder operations level training if staff are to participate in spill response a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.	Maintenance Area	

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BEST	004	2	40 CFR 355.30 (b)	Emergency Response Planning and Reporting	<p>One-time reporting notification for sulfuric acid was not completed. Park personnel were unsure if the threshold planning quantity (TPQ) for sulfuric acid was exceeded.</p> <p>-----</p> <p>Note: Vehicle type batteries trigger the sulfuric acid reporting requirement. Approximately 50 typical vehicle batteries on-site at any given time (Park-owned and operated) will exceed the 1,000-pound TPQ for sulfuric acid.</p>	<p>Contact SERC and complete one-time reporting notification within 60 days of exceeding the quantity limit.</p> <p>Maintain documentation on applicability of this one time reporting requirement in a central Emergency Planning and Community Right-to-Know Act file.</p>	Park-wide	
BEST	005	2	40 CFR 355.30 (c)	Emergency Response Planning and Reporting	<p>A Park representative was not chosen to participate in the local emergency planning committee (LEPC) process as the facility emergency response coordinator.</p> <p>-----</p> <p>Note: A representative must be chosen because the TPQ for sulfuric acid was exceeded.</p>	Identify an individual to represent the Park on the LEPC.	Park-wide	

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BEST	006	2	40 CFR 370.21 (a)	Emergency Response Planning and Reporting	<p>Park personnel could not demonstrate that a list of chemicals or corresponding material safety data sheets (MSDSs) were submitted to the State Emergency Response Council (SERC), Local Emergency Planning Committee (LEPC), and local fire department(s). Park personnel would have to report on gasoline and diesel.</p> <p>-----</p> <p>Note: Facilities that store greater than the threshold planning quantity (TPQ) or 500 pounds, which ever is less, for extremely hazardous substances (i.e., sulfuric acid) or greater than 10,000 pounds of a hazardous substance as defined by OSHA (i.e., gasoline) are required to report as stated above.</p>	<p>Submit either a list of chemicals and their corresponding hazards or MSDSs to the SERC, LEPC, and fire department officials. Update information on an as needed basis (i.e., new chemicals or new information).</p> <p>Document submission to each group and maintain documentation with other Emergency Planning Community Right-to-Know Act (EPCRA) documents.</p>	Park-wide	

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BEST	007	2	40 CFR 370.20 (d)	Emergency Response Planning and Reporting	Park personnel could not demonstrate that Tier I or Tier II annual reports were submitted to the SERC, LEPC, and fire department by March 1 of each year. Park personnel would have to report on gasoline and diesel fuel.	<p>Contact SERC to determine if facility is required to submit a Tier I or Tier II report and obtain appropriate forms.</p> <p>Information required typically includes the chemical name, an estimate of the maximum amount of chemical present at any time during the preceding calendar year and average daily amount, brief description of the manner of storage, and location of chemical.</p>	Park-wide	
BEST	008	2	29 CFR 1910.120 (q)(6)(i)	Emergency Response Planning and Reporting	Training was not conducted for personnel participating at the awareness level in responding to incidental spills in the Emergency Response Plan.	Provide awareness level training to all employees who may discover a release of hazardous materials or respond to an incidental spill, but are not trained in clean-up procedures.	Park-wide	
BEST	009	2	EO 13123 Sec 406 (d)	Energy and Water Conservation	Staff was not educated on energy efficient practices, such as replacing incandescent bulbs with high efficiency fluorescent bulbs and servicing equipment regularly to ensure maximum efficiency.	Train staff on energy efficient practices. This may include replacing incandescent bulbs with high efficiency fluorescent bulbs, and servicing equipment regularly to ensure maximum efficiency.	Park-wide	

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BEST	010	2	NFPA 30A, 6-7	Fuel Storage Tanks	A clearly identified and easily accessible switch or circuit breaker was not marked to show that it shut off the power to all fuel dispensing devices in the event of an emergency. The switch was located inside the Gas Building located directly next to tanks.	Mark outside of building to clearly identify the location of switch. Dismantle old signage from previous switch located on the side of Maintenance Building.	Maintenance Area	
BEST	011	2	NFPA 30A, 4.3.7.2	Fuel Storage Tanks	Aboveground storage tanks did not have bollards that were sufficient to prevent vehicular damage.	Install bollards that are 4 inches or greater in diameter and 4 feet apart to protect tanks from vehicular damage.	Maintenance Area	
BEST	012	2	40 CFR 112.8 (d)(1)	SPCC Planning	Single walled steel line from tank to dispensing pump was beginning to corrode.	Further inspect the line to establish the extent of corrosion. Based on that inspection, provide adequate protection against further corrosion by either installing line secondary containment or reinstalling a fuel line that is cathodically protected against corrosion.	Maintenance Area	
BEST	013	2	NFPA 30A 9.2.1	Fuel Storage Tanks	Aboveground storage tank inventory records were not present.	Maintain accurate inventory records on site for indication of possible leakage from tanks or piping. This inventory should include the date of every oil delivery, amount of oil delivered, and the amount of oil used between deliveries.	Park-wide	

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BEST	014	2	NFPA 30A, 6.5.2	Fuel Storage Tanks	All fuel dispensing hoses did not include a breakaway devices designed to retain liquid on both sides of the break away point.	Install breakaway devices on all gasoline dispenser hoses. This will prevent any discharge of fuel in case of hose shear.	Park-wide	
BEST	015	2	NFPA 30, 5.2.5	Fuel Storage Tanks	Aboveground storage tanks were not color-coded or other marked in a manner that could be used to identify the product for which the tank was used.	Label the tanks so that the contents can be identified.	Park-wide	
BEST	016	2	EO 13148 Sec. 304	Green Procurement	Pollution prevention program had not been developed nor implemented that considered the life cycle cost of products purchased by the Park.	Develop and implement a pollution prevention program that considers the life cycle costs of treatment and/or disposal of waste or pollutants generated by a product compared to the life cycle costs of alternatives to eliminate or reduce such pollutants.	Park-wide	

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BEST	017	2	EO 13148, Sec. 404 (a)	Green Procurement	Green procurement training was not provided for all employees authorized to make purchases.	<p>Provide staff with green procurement guidance, NPS policies, procedures, fact sheets, internet addresses, updates, and contact with NPS experts.</p> <p>Train staff on use of GSA Advantage website for Comprehensive Procurement Guidelines (CPG) item information.</p> <p>Formal documentation of communication and training should be implemented.</p>	Park-wide	

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BEST	018	2	EO 13149, Sec 201	Green Procurement	A program was not in place to reduce the vehicle fleet's annual petroleum consumption by at least 20 percent by the end of FY 2005.	<p>Develop a strategy to meet petroleum reduction levels. An example of this may include:</p> <ul style="list-style-type: none"> <li>- The use of alternative fuels;</li> <li>- An increase in vehicle load factors;</li> <li>- A decrease in vehicle miles traveled; and</li> <li>- A decrease in fleet size.</li> </ul> <p>As a best management practice, the strategy should be written to demonstrate Park's progress.</p> <p>Incorporate fuel usage reduction goals in Park's environmental management system (EMS) target goals.</p>	Park-wide	

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BEST	019	2	40 CFR 247.6	Green Procurement	An Affirmative Procurement Program (APP) was not established.	Establish an APP that includes the following elements: - A preference for purchasing items designated under EPA's Comprehensive Procurement Guidelines (CPG) including retread tires; - Methods for promoting the Park's green procurement activities; - Procedures for obtaining and verifying estimates of recycled content from vendors and contractors; - An annual review and monitoring program effectiveness; and - Documentation to demonstrate past and present purchases of environmentally preferable products.	Park-wide	
BEST	020	2	29 CFR 1910.1200 (e)(1)(i)	Hazard Communication	The written Hazard Communication (HAZCOM) Program did not include a list of the hazardous chemicals known to be present at Park facilities.	Develop an inventory of all hazardous chemicals present at Park facilities. List may be compiled by individual work area or as a whole. List can be maintained in the material data safety sheet (MSDS) binders or as an appendix to the written HAZCOM Program.	Park-wide	

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BEST	021	2	29 CFR 1910.1200 (g)(1)	Hazard Communication	Material Safety Data Sheets (MSDSs) were not maintained for each chemical used in the Park.	<p>Obtain, maintain, and make readily accessible, MSDSs for each hazardous chemical utilized within the Park. MSDSs may be obtained from:</p> <ul style="list-style-type: none"> <li>- The manufacturer;</li> <li>- Cornell University's web site (<a href="http://msds.pdc.cornell.edu/msdssrch.asp">http://msds.pdc.cornell.edu/msdssrch.asp</a>); and</li> <li>- Place of purchase.</li> </ul> <p>Develop and utilize an annual chemical inventory sheet to cross check for missing MSDSs. Also utilize the opportunity to eliminate MSDSs for products that are no longer present and will not be used in the future. MSDSs for inactive products should be archived in case any future issues related to the products arise.</p>	Park-wide	

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BEST	022	2	29 CFR 1910.1200 (f)(5)	Hazard Communication	<p>Containers used to store chemicals lacked appropriate identification and warning labels. The following examples were observed:</p> <ul style="list-style-type: none"> <li>- Paint was stored in a bleach container in the flammable storage building without a label designating its contents; and</li> <li>- One Windex bottle, labeled "deodorizer", in the bathroom storage closet did not have hazard ratings.</li> </ul> <p>-----</p> <p>Note: The majority of containers stored throughout the Park were labeled correctly.</p>	<p>Label all containers with:</p> <ul style="list-style-type: none"> <li>- Identity of contents; and</li> <li>- Hazard warnings.</li> </ul> <p>If hazardous chemicals are not stored in the original container, the following information is needed on the label as a best management practice (BMP); ·</p> <ul style="list-style-type: none"> <li>- Date material was transferred; and</li> <li>- Responsible party.</li> </ul> <p>-----</p> <p>Note: Labeling is not required if contents in the container are intended for immediate use or for containers that are used for transfer only.</p>	Park-wide	

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BEST	023	2	Uniform Fire Code, UFC 80.301(n)	Hazardous Material Management	Incompatible chemicals were stored together. For example, two 1-gallon containers of muratic acid were stored with flammables in the Gas Building and fifteen gallons of bleach were stored next to lime in the Maintenance Building outside storage cabinet.	<p>Store incompatible chemicals in separate locations. The following should be used as a guideline:</p> <ul style="list-style-type: none"> <li>- Cabinets storing flammable liquids should contain flammable and combustible liquids only;</li> <li>- Incompatible acids should be stored separately from each other (i.e., nitric acid, perchloric acid, acetic acid);</li> <li>- Acids and bases must be stored separately; and</li> <li>- All cabinets that contain hazardous materials, whether approved or not, must be labeled on the outside as to its contents. Letters must be at least 1 inch high.</li> </ul> <p>Reinforce incompatible chemical storage in 1 hour Hazard Communication (HAZCOM) refresher training.</p>	Park-wide	

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BEST	024	2	29 CFR 1910.253 (b)(4)	Hazardous Material Management	Acetylene and oxygen tanks were stored on a portable cart that was not used regularly.	Disconnect and store acetylene and oxygen tank at a minimum of 20 feet (see related finding on storage requirements). Acetylene and oxygen tanks that are not used on a regular basis are considered stock tanks and must be separated.	Maintenance Area	
BEST	025	2	29 CFR 1910.106 (d)(5)(iii)	Hazardous Material Management	Flammable liquids were observed in a metal cabinet used to store pesticides in a third floor office.	Move stored flammable and combustible containers outside of office building.	Headquarters Building	
BEST	026	2	29 CFR 1910.106 (d)(4)(i)	Hazardous Material Management	Hazardous materials storage rooms did not have 4-inch raised sills or ramps to prevent spills from leaving the room. The seams where the wall met the floor were not liquid tight.	Provide secondary containment for materials stored to prevent unauthorized spills.	Hazardous Materials Storage Rooms	
BEST	027	2	29 CFR 1910.106 (e)(2)(ii)(b)	Hazardous Material Management	There was over 25 gallons of thinner (Class 1A liquid) stored outside of the flammable storage cabinets.	Reduce the amount of thinner to be stored, find another location for storage, or install a flammables storage cabinet to lower the total amount stored outside a cabinet less than 25 gallons.	Paint Room	
BEST	028	2	29 CFR 1910.106 (d)(2)(iii)	Hazardous Material Management	Fuel (Class 1A liquid) was stored in a 5-gallon plastic portable container. ----- Note: Fuel may not be stored in plastic containers greater than 1 pint.	Store fuel in an OSHA-approved 2-gallon safety can.	Paint Room	

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BEST	029	2	40 CFR 262.11	Hazardous Waste Management	<p>Outdated chemicals were stored. Observed chemicals included but were not limited to:</p> <ul style="list-style-type: none"> <li>- Various paint products in the flammable cabinet.</li> </ul>	<p>Identify all old, outdated, and unused chemicals at the facility. Collect and store the chemicals, ensuring that:</p> <ul style="list-style-type: none"> <li>- Hazardous waste containers are in good condition;</li> <li>- Hazardous waste containers are closed (with all bungs closed tight) except when actually adding or removing waste;</li> <li>- Hazardous waste containers are labeled with the words "Hazardous Waste" and contents of the container;</li> <li>- Containers are stacked no more than two containers high on shelves or pallets, and stored with sufficient aisle space to allow for inspection and movement of containers;</li> <li>- Incompatible hazardous wastes are segregated to prevent mixing in the event of spills (see Incompatibility Chart from the Environmental Compliance Assistance CD); and</li> <li>- Containers of hazardous waste are labeled with accumulation start dates.</li> </ul> <p>Dispose of wastes via a certified hazardous waste disposal facility.</p> <p>If the chemicals are to be used, but have expired, follow the manufacturer's instructions for disposal.</p>	Paint Shop	

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BEST	030	2	NPS 77, Program Guidance IV-F	Pesticide Management	Pesticides were not stored in locked, fireproof, and ventilated areas. The following was observed: - One container of Dragon - Liquid Deer Fence; and - One container of Ortho dial-a-spray.	Store all pesticides in a locked, fireproof, ventilated area. Store like-pesticides on the same shelf. Conduct a walk-through to gather all miscellaneous pesticides (i.e., wasp sprays) and store in the newly designated area.	Headquarters Building	
BEST	031	2	NPS-77, IPM, Program Guidance IV-D	Pesticide Management	Documentation was not available during the site visit to demonstrate that Pesticide Use Log Forms were submitted annually to the Regional IPM coordinator.	Document all pesticide use on Pesticide Use Log Forms and submit annually to the Regional IPM coordinator.	Education Center	

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BEST	032	2	Special Directive 91-1	Solid Waste Management	An Integrated Solid Waste Alternative Program (ISWAP) that promotes waste reduction, management, and recycling for Park staff and visitors was not developed.	Develop a written ISWAP that includes the following elements: - Description of the solid waste program; - Tonnage or volume information on trash and recyclables; - Breakdown of costs associated with each element of the solid waste program; - Potential influences on the program (changes in visitation, regulatory changes); - Description of state and local waste prevention and recycling requirements; - Performance goal exceedances established by PFMD/WASO; - Description and evaluation of alternative program options; and - Description of resources required to help the Park implement its recommendations and achieve its programmatic goals.	Park-wide	

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BEST	033	2	40 CFR 112.7 (c)	SPCC Planning	The 500-gallon fuel storage tank was provided with secondary containment.	Secondary containment (such as a cement floor and a dike) should be provided for the Historic House storage tank so that in the event of an oil release, oil would not flow into the dirt floor or into the sump pump.	Historic House	
BEST	034	2	40 CFR 112.7 (c)	SPCC Planning	Secondary containment was not provided for two mobile 500-gallon tanks.	Provide secondary containment for both tanks. Consider a collapsible-sided containment system for quick removal of tanks if necessary.	Maintenance Area	
BEST	035	2	40 CFR 112.7 (d)	SPCC Planning	Emergency spill kits for fuel tanks were not available for staff. Spill kits would be needed for all tanks, including vehicle-fueling tanks, heating oil tanks, and mobile tanks.	Make the kits available to all trained staff in case of a spill. Ensure that the area chosen is not a secure area preventing a timely deployment.	Maintenance Area	

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BEST	036	2	40 CFR 112.7 (f)	SPCC Planning	Training was not provided to instruct personnel in the operation and maintenance of equipment to prevent discharges of oil and applicable pollution control laws, rules, and regulations.	<p>Train all personnel responsible for oil-handling in the following:</p> <ul style="list-style-type: none"> <li>- Operation and maintenance of equipment to prevent the discharge of oil;</li> <li>- Discharge procedure protocols;</li> <li>- Applicable pollution control laws, rules, and regulations;</li> <li>- General facility operations; and</li> <li>- The contents of the facility Spill Prevention Control and Countermeasure (SPCC) Plan.</li> </ul> <p>The SPCC Coordinator should be responsible for tracking which Park personnel need training and assuring that training is received.</p> <p>Document training in master SPCC Plan.</p>	Park-wide	
BEST	037	2	40 CFR 112.7 (c)	SPCC Planning	Fill pipe secondary containment basin was rusted at tank top.	Repair containment basin with a material compatible with fuel to ensure full available capacity and introduction of rainwater into the tank system.	Maintenance Area	

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BEST	038	2	40 CFR 273.14 (e)	Universal Waste Management	Fluorescent lamp storage container was not labeled with one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".	Label all containers storing used fluorescent lamps with one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".	Maintenance Area	
BEST	039	2	40 CFR 273.15 (c)	Universal Waste Management	Length of time universal waste accumulated (fluorescent lamps and batteries) was not demonstrated. ---- Note: Fluorescent lamps and batteries can either be handled as hazardous waste or universal waste.	Generators of universal waste must demonstrate waste is not stored for longer than one year from the date it becomes a waste. Demonstration can be made by labeling a collection container with the earliest date universal waste was placed in the container, maintaining an inventory system, or marking the date on each individual universal waste item (i.e., each fluorescent lamp or battery).	Maintenance Area	
<i>BEST</i>	<i>040</i>	<i>3</i>	<i>BMP</i>	<i>Energy and Water Conservation</i>	<i>A formal energy audit was not conducted to assess Park status with respect to energy usage and opportunities for improvement. There were no procedures to formally consider energy efficiency, renewable energy, or sustainable design concepts in building design.</i>	<i>Contact the NPS Regional Energy Coordinator to obtain assistance in conducting an energy audit and developing conservation implementation plans. Form an energy team/task force. Seek designated funding for select energy projects.</i>	<i>Park-wide</i>	

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BEST	041	3	BMP	Environmental Management Systems	An integrated program to provide and track environmental training for all relevant employees was not in place. Consolidated training files were unavailable. Training gaps were identified (i.e., staff were not trained or training was not current) in many environmental programs at the Park. These include: - HAZCOM; and - Affirmative/Green Procurement; and – ERP and SPCC.	Conduct an environmental training needs assessment to identify training needs of all employees whose work requires environmental training or may impact the environment. Establish procedures to ensure that all staff responsibilities are assessed and that they meet training requirements based on their assignments. Also, develop and implement Park environmental management system training for employees to educate them on Park environmental policy, goals and objectives, accountability systems, and other Park environmental management system components. Establish a central training records system and tickler system to remind Park employees on training needs.	Park-wide	

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BEST	042	3	BMP	Environmental Management Systems	A system for managing and preserving all documents and records essential to demonstrate environmental compliance was not in place.	Assess environmental documentation requirements Park-wide and develop a document control system. The system should consist of a central file with necessary Park-wide records, a strategy for and record of distributed documents so that their locations are known and their distribution can be managed, a designation of responsibilities for file maintenance, and procedures to keep files current.	Park-wide	
BEST	043	3	BMP	Environmental Management Systems	Environmental management responsibilities were not fully integrated in all key employee job descriptions or performance evaluations for all divisions within the Park. ----- Note: Some job descriptions covered natural resource protection and waste disposal, but did not incorporate environmental management responsibilities.	Review job responsibilities for employees (formalized or collateral duty job assignments) to identify environmental management responsibilities. Incorporate environmental job responsibilities into job descriptions. Establish performance goals related to environmental responsibilities and consider environmental criteria in overall performance reviews.	Park-wide	

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BEST	044	3	BMP	Environmental Management Systems	<p>There were no regular procedures in place to review current federal, state and local laws, regulations and Executive Orders, receive updates on new requirements, or determine applicability of requirements to specific operations.</p> <p>-----</p> <p>Note: Park had program in place to review Park Service-specific regulatory updates.</p>	<p>Develop procedures to assure that management stays abreast of applicable regulatory requirements. Processes could include the following:</p> <ul style="list-style-type: none"> <li>- Periodic planned contact with State regulators for regulatory updates;</li> <li>- Periodic planned contact with NPS Regional Environmental staff for regulatory updates;</li> <li>- Periodic planned contact with NPS HQ staff in the Hazardous Waste Management and Pollution Prevention Team for the purpose of receiving environmental updates;</li> <li>- Regular review of NPS environmental alert list servers and web sites (e.g., NPS Renew Web Site); and</li> <li>- Participation in environmental conferences and seminars.</li> </ul>	Park-wide	

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BEST	045	3	BMP	Environmental Management Systems	A formal "Environmental Policy" was not developed, adopted, and disseminated.	Develop and disseminate a formal environmental policy that outlines Park management commitment to environmental management in all operations.	Park-wide	
BEST	046	3	BMP	Hazard Communication	An individual was not designated as the responsible party for the written HAZCOM program.	Designate someone responsible for the written HAZCOM program. Communicate this information Park-wide. Ensure the designee is allowed time and resources needed to fulfill their responsibility.	Park-wide	
BEST	047	3	BMP	Hazardous Material Management	Flammables and combustibles were stored outside in a makeshift cabinet that was not fire rated.	Store all flammables and combustibles in a 2-hour fire-rated flammable storage cabinet.	Education Center	
BEST	048	3	BMP	Hazardous Material Management	Materials stored directly on the floor of the flammable storage cabinets decreased the capacity of the secondary containment.	Install grates or an additional shelf in the bottom of flammable cabinets so as to prevent loss of secondary containment capacity in the cabinet allowing any spills to be contained within the cabinet.	Maintenance Area	